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16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18 ASSOCIATED INDUSTRIES
19 INSURANCE COMPANY, INC.,

Case No. 2:23-cv-01252-RFB-VCF

20 Plaintiff,

21 v.

22 NAVIGATORS SPECIALTY INSURANCE
23 COMPANY,

24 **STIPULATION TO EXTEND TIME TO
25 RESPOND TO THE COMPLAINT
(FIRST REQUEST)**

26 Complaint Filed: August 11, 2023
27 Trial Date: None set

28 Defendant.

19 Pursuant to Local Civil Rule 6-1(a), Defendant NAVIGATORS SPECIALTY
20 INSURANCE COMPANY (“Defendant”) and Plaintiff ASSOCIATED INDUSTRIES
21 INSURANCE COMPANY, INC. (“Plaintiff”), by and through their respective counsel of record,
22 hereby stipulate as follows:

23 WHEREAS, Plaintiff filed a Complaint on August 11, 2023;

24 WHEREAS, Plaintiff served its Complaint on Defendant on August 28, 2023;

25 WHEREAS, Defendant currently has until Monday, September 18, 2023, to answer or
26 respond to Plaintiff’s Complaint;

27 WHEREAS, Defendant has requested and Plaintiff has consented to an additional 15 days
28 for Defendant to file an answer or otherwise respond to the Complaint;

1 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties, through
2 their respective counsel, that Defendant shall answer or otherwise respond to Plaintiff's Complaint
3 on or before October 2, 2023.

4 This is the first stipulation filed by the parties for an extension of time to respond to
5 Plaintiff's Complaint.

6 IT IS SO STIPULATED.

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9 Dated: September 15, 2023

MORALES FIERRO & REEVES

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By: /s/ Ramiro Morales

Ramiro Morales
Kelly A. Hedberg
Attorneys for Plaintiff
Associated Industries Insurance
Company, Inc.

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**McCLOSKEY, WARING, WAISMAN
& DRURY LLP**

By: /s/ Andrew R. McCloskey

Andrew R. McCloskey
Attorney for Defendant
Navigators Specialty Insurance
Company

Dated: 9-15-2023

IT IS SO ORDERED:



Cam Ferenbach
United States Magistrate Judge

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 15th day of September, 2023, a true and correct copy of **STIPULATION TO EXTEND TIME TO RESPOND TO THE COMPLAINT (FIRST REQUEST)** was served electronically via the court's Odyssey CM/ECF system to all parties on the CM/ECF Service Contact List in accordance with the mandatory electronic service requirements of Administrative Order 14-2 and the Nevada Electronic Filing and Conversion Rules.

Noemi Wright